

**STATE OF WASHINGTON  
GAMBLING COMMISSION**

In the matter of:

KANHA S. PRUM  
License No. 68-07087,

Licensee.

OAH Docket No. 03-2021-GMB-00172  
GMB No. CR 2020-01587

**STIPULATED SETTLEMENT  
AGREEMENT**

The Washington State Gambling Commission Staff (Commission Staff), by and through its attorneys ROBERT W. FERGUSON, Attorney General, and DOUG VAN DE BRAKE, Assistant Attorney General, and its Interim Director, TINA GRIFFIN, and the Licensee, KANHA PRUM, represented by attorney ALBERTO GUADAGNO, enter into this Stipulated Settlement Agreement (Agreement) for Case Number CR 2020-01587.

**I. INTRODUCTION**

1. The Washington State Gambling (Commission) issued Kanha Prum (Licensee) a gambling license, License No. 68-07087, authorizing Public Card Room Employee activity at Macau Casino in Lakewood, Washington. This license, which expires on August 19, 2021, was issued subject to Licensee's compliance with all state gambling laws and Commission rules at all times following licensure.

2. On February 24 2021, the former Director of the Commission issued a Notice of Administrative Charges under cause number 2020-01587. The charges allege that Ms. Prum engaged in professional gambling by playing in unlicensed card games in violation of

1 RCW 9.46.221 and RCW 9.46.0269(1)(a) and (b), and participated in gambling activity for  
2 which a license is required, in violation of RCW 9.46.160. A copy of the Notice of  
3 Administrative Charges is appended to this Agreement.

4 3. The charges seek revocation of Ms. Prum's gambling license under the authority  
5 of RCW 9.46.075(1), (2), and (8), RCW 9.46.153(1), and WAC 230-03-085(1), (3), and (9)(d)  
6 and (e).

7 4. Ms. Prum timely requested a hearing. The case is scheduled for an evidentiary  
8 hearing on July 2, 2021, before the Office of Administrative Hearings, Docket No.  
9 03-2021-GMB-00172.

10 5. Having reviewed the facts and circumstances of the case, the parties wish to enter  
11 into this Agreement to resolve this matter by means of a three-month suspension of Licensee's  
12 gambling license.

## 13 II. AGREEMENT OF THE PARTIES

14 The Commission and the Licensee agree to the following:

15 1. The Commission and the Licensee enter into this Agreement to avoid the time  
16 and expense of further litigation.

17 2. This Agreement constitutes the final written expression of all the terms of the  
18 parties' agreement and is a complete and exclusive statement of the terms of its agreement.

19 3. Licensee admits to the violations charged in the Notice of Administrative Charges  
20 and acknowledges that if the trier of fact found a preponderance of the evidence established the  
21 charges, the Commission would have authority to revoke Licensee's license.

22 4. The parties agree that the Commission will consider that the violations set forth  
23 in the Notice of Administrative Charges are established for purposes of Licensee's  
24 administrative licensing record. The Commission agrees that if Licensee commits no further  
25 violations within one-year from the effective date of this Agreement, the terms of the Agreement  
26 shall be completed. At that point, neither the admissions in this Agreement nor the fact of the

1 Agreement shall constitute the sole basis on which a license renewal application may be denied  
2 under WAC 230-03-085.

3 5. In exchange for Licensee's willingness to accept responsibility for the violations  
4 charged and commitment to ensuring no future violations, the Commission is willing to agree to  
5 a reduced penalty consisting of a three-month suspension of Licensee's Public Card Room  
6 Employee gambling license.

7 6. The three-month license suspension period shall commence at 10:00 a.m.,  
8 Pacific Daylight Time, on Tuesday, July 13, 2021, and end at 10:00 a.m., Pacific Daylight Time,  
9 on Monday, October 11, 2021.

10 7. Licensee understands that she is prohibited during the suspension period from  
11 engaging in any gambling activities for which a gambling license is required. This does not  
12 prevent Licensee from working in non-gambling related employment at an establishment  
13 engaged in authorized gambling activities or in Class III tribal gaming activities.

14 8. Licensee explicitly waives the right of further administrative or judicial review  
15 of any all matters related to Office of Administrative Hearings Docket No. 03-2021-GMB-00172  
16 and the Notice of Administrative Charges.

17 9. The undersigned parties declare and agree that the terms of this Agreement are  
18 completely read, wholly understood, and voluntarily accepted for the purpose of making a full  
19 and final compromise and settlement of any and all administrative claims arising from the Notice  
20 of Administrative Charges.

21 10. By signing below, the attorneys for the parties, and the Director of the  
22 Commission, represent that they have authority to enter into this Agreement on behalf of their  
23 respective clients and the Commission.

24 ///


25 ///

26 ///


11. The parties recognize that this Agreement is subject to the approval of the Director of the Commission.

12. This Agreement shall become effective once signed by both parties.


**STIPULATED AND AGREED TO:**

  
KANHA S. PRUM  
Licensee

7-7-21  
DATE

  
ALBERTO GUADAGNO, WSBA #36340  
Guadagno Law, PLLC  
Attorney for Kanha S. Prum


7/7/2021  
DATE

  
TINA GRIFFIN  
Interim Director  
Washington State Gambling Commission

7/12/2021

DATE

ROBERT W. FERGUSON  
Attorney General

  
07.08.2021

DOUG VAN DE BRAKE, WSBA #33644  
Approved as to form  
Assistant Attorney General  
Attorneys for the Washington State Gambling Commission Staff

DATE



STATE OF WASHINGTON  
GAMBLING COMMISSION

*"Protect the Public by Ensuring that Gambling is Legal and Honest"*

February 23, 2021

Kanha Prum  
7412 Golden Given Rd. Apt. 4  
Tacoma, WA 98404

**Subject: Administrative Charges**

- Enclosed is a Notice of Administrative Charges issued by the Director of the Gambling Commission alleging you have violated gambling rules and your license may be suspended or revoked.

What should I do?

- To discuss settlement options and to preserve your right to a hearing, you must complete and sign the attached Hearing Request Form.
- We must receive your Hearing Request within 23 days from the date the charges were mailed.

What happens once I send in the Request for Hearing?

- Once we receive your hearing request, we will contact you about settling your case. If we cannot settle the case, a hearing will be scheduled.

What happens if I do NOT return the Hearing Request?

- If you do NOT return the hearing request form on time, an Order of Default suspending your license will be presented to the Commission, with no further notice to you.

Can I continue to work?

- You may continue to work authorized gambling activities until there is a final order on your case.

You must submit your hearing request on time. If you have questions, please call (800) 345-2529, extension 3473, or e-mail [ashlie.laydon@wsgc.wa.gov](mailto:ashlie.laydon@wsgc.wa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Ashlie Laydon".

Ashlie Laydon, Rules Coordinator  
Licensing, Regulation, and Enforcement

Enclosures

## **Important Notice of Administrative Charges against Gambling License or Class III Certification**

The Director of the Gambling Commission has sent a Notice of Administrative Charges against you or your employee. A copy of the charges has been sent with this notice.

### **Information for Licensees and Certified Employees Named in Administrative Charges**

- You have the right to a hearing. The Request for Administrative Hearing and Interpreter form **MUST** be completed by the charged individual/entity and *received* by us either within 23 days from the date the Charges were mailed via regular mail or within 20 days from the date you receive the Charges by certified mail or personal service.
- If the form is not received on time, your license/certification can be revoked (cancelled) and you will be unable to work or conduct gambling activities.
- You may continue to work or operate gambling activities until a final order is issued in your case.

### **Information for Employers**

- Our records show the employee named in the charges is a current or former employee. This is a courtesy copy of the charges, you need not respond.

**If you have questions, please call (800) 345-2529, extension 3473, or e-mail [ashlie.laydon@wsgc.wa.gov](mailto:ashlie.laydon@wsgc.wa.gov).**

**STATE OF WASHINGTON  
GAMBLING COMMISSION**

In the Matter of:

NO. CR 2020-01587

**KANHA S. PRUM**  
License No. 68-07087

**NOTICE OF ADMINISTRATIVE  
CHARGES**

\_\_\_\_\_  
Licensee.

These administrative charges are brought under and in accordance with Chapter 9.46 RCW, the Washington State Gambling Act, Chapter 34.05 RCW, the Administrative Procedure Act, and Title 230 WAC, Rules adopted by the Gambling Commission.

**I. LICENSE**

1. The Washington State Gambling Commission (WSGC) issued Licensee Kanha Prum a gambling license, License No. 68-07087, authorizing Public Card Room Employee activity at Macau Casino in Lakewood, Washington.

2. This license, which expires on August 19, 2021, was issued subject to Prum's compliance with state gambling laws and Commission rules.

**II. FACTUAL BACKGROUND**

1. On November 4, 2019, a WSGC Special Agent received an anonymous complaint regarding an illegal gambling operation. According to the complainant nearly every night a group of people, primarily public card room and tribal casino employees, played a Chinese card game where they "bought in" for each hand and paid tips to the renter of the apartment located in Tacoma.

NOTICE OF ADMINISTRATIVE CHARGES

1

IN RE: KANHA S. PRUM  
NO. CR 2020-01587

Washington State Gambling Commission  
4565 7<sup>th</sup> Avenue S.E., Lacey, WA 98503  
P.O. Box 42400  
Olympia, WA 98504

1           2.       From this initial contact until September 30, 2020, the Agent communicated  
2 with the complainant via text message. Through these conversations, the Agent learned that  
3 the players sit on the ground, putting money into a red tin for "tips." When a new hand is dealt,  
4 players put a chip into the red tin; if they do not pay with a chip, they are not dealt cards.

5           3.       According to the complainant, the resident of the apartment keeps all chips and  
6 cash in the tin in order to pay for food that is provided. The players then make separate wagers  
7 amongst themselves. The complainant provided the Agent with numerous pictures of the  
8 games being played, identifying each person found in the photos.

9           4.       During the ongoing discussion with the Agent, the complainant also voiced  
10 concerns about the games going on while COVID-19 mandates were in effect. According to  
11 the complainant, players were not wearing their required masks, and were often in groups  
12 larger than 14 people in the apartment.

13           5.       The complainant notified the Agent that the original location, 3707 East E St.  
14 #3 in Tacoma, Washington was no longer being used for the games. Instead, the games were  
15 being held on a regular basis at a new Tacoma address, 7416 Golden Given Road E #09. Upon  
16 receiving this information, the Agent began performing surveillance at this location.

17           6.       On March 31, 2020 the Agent performed surveillance on the property. The  
18 entire time that he was surveilling the property, the Agent observed a vehicle with the  
19 Washington State license plate number APK3761 parked at the apartment complex. The Agent  
20 was able to verify that this vehicle was registered to Card Room Employee Kanha Prum.

21           7.       On April 16, 2020, while surveilling the property, the Agent observed the silver  
22 Honda registered to Prum parked in the apartment complex. Unlike the other vehicles the  
23 Agent observed on this date, Prum's vehicle was parked in a stall reserved for residents of the  
24 apartment complex.

25  
26  
NOTICE OF ADMINISTRATIVE CHARGES

2

IN RE: KANHA S. PRUM  
NO. CR 2020-01587

Washington State Gambling Commission  
4565 7<sup>th</sup> Avenue S.E., Lacey, WA 98503  
P.O. Box 42400  
Olympia, WA 98504



10. Prum reiterated at the end of the interview that it was a group of friends that all work at casinos getting together to play for fun. The games continued through the COVID-19 pandemic because the players were bored and lonely from being stuck at home, not able to go to work.

### III. BASIS FOR REVOCATION

1: By regularly playing in unlicensed and illegal card games, Kanha Prum engaged in professional gambling by engaging in conduct which materially aids any form of gambling activity and by paying a fee to participate in a card game. In doing so, Prum is in violation of RCW 9.46.221, Professional Gambling in the Second Degree, defined by RCW 9.46.0269(1)(a) and (b).

2. By participating in the unlicensed and illegal card games, Kanha Prum was conducting an activity for which a license is required, without the required license issued by the WSGC. In doing so, Prum is in violation of RCW 9.46.160

3. Kanha Prum has failed to prove by clear and convincing evidence that she is qualified for licensure, as required by RCW 9.46.153(1).

4. The Commission is authorized to revoke Kanha Prum's Public Card Room Employee license pursuant to RCW 9.46.075(1), (2), and (8), RCW 9.46.153(1), and WAC 230-03-085(1), (3), and (9)(d) and (e).

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11

IV. REVOCATION

1. The above-referenced findings are a sufficient basis for revocation of Kanha Prum's Public Card Room Employee License.

2. Based on the facts and violations referenced above, the penalty for Kanha Prum's actions is **REVOCATION** of her Public Card Room Employee License.

I have read this Notice of Administrative Charges, know the contents of it, believe it to be true, and have executed this Notice in my capacity as Director of the Washington State Gambling Commission.

*David Trujillo*

2/19/2021

DAVID TRUJILLO, DIRECTOR  
Washington State Gambling Commission

Date

NOTICE OF ADMINISTRATIVE CHARGES

4

IN RE: KANHA S. PRUM  
NO. CR 2020-01587

Washington State Gambling Commission  
4565 7<sup>th</sup> Avenue S.E., Lacey, WA 98503  
P.O. Box 42400  
Olympia, WA 98504

**HEARING NOTICE**

You have the opportunity to request a hearing to contest the Commission's decision to revoke your public card room employee license. To request a hearing and/or discuss settlement options, the Commission must receive the enclosed hearing request form within 23 days from date of our mailing identified below. *Failure to return the enclosed hearing request will result in a default order revoking your license.*

NOTICE OF ADMINISTRATIVE CHARGES

5

IN RE: KANHA S. PRUM  
NO. CR 2020-01587

Washington State Gambling Commission  
4565 7<sup>th</sup> Avenue S.E., Lacey, WA 98503  
P.O. Box 42400  
Olympia, WA 98504

**CERTIFICATE OF SERVICE**

I certify that on the date below I served a copy of the foregoing document on all parties or their counsel by United States Postal Service regular and certified mail to the following:

KANHA S PRUM  
7412 GOLDEN GIVEN RD APT 4  
TACOMA WA 98404

EXECUTED this 24 day of February, 2021, at Lacey, Washington.

  
\_\_\_\_\_  
Ashlie Layton  
Rules Coordinator

NOTICE OF ADMINISTRATIVE CHARGES

6

IN RE: KANHA S. PRUM  
NO. CR 2020-01587

Washington State Gambling Commission  
4565 7<sup>th</sup> Avenue S.E., Lacey, WA 98503  
P.O. Box 42400  
Olympia, WA 98504

## Important Notice

This is an important notice about your gambling license. If you do not respond, you may lose your license and be unable to work. If you have questions about these papers, please call (360) 486-3471. Please call an attorney if you have legal questions.

ອັນນີ້ແມ່ນໃບຢັ້ງຢືນສຳຄັນກ່ຽວກັບໃບອະນຸຍາດການພະນັນຂອງທ່ານ. ຖ້າທ່ານກວາທ່ານບໍ່ຕອບມາ, ທ່ານຈະເສື່ອໃບອະນຸຍາດຂອງທ່ານ ແລະ ຈະບໍ່ສາມາດທີ່ຈະເຮັດວຽກໄດ້. ຖ້າທ່ານກວາທ່ານມີຄຳຖາມກ່ຽວກັບເຈ້ງເຫຼົ່ານີ້, ກະຮຸນາໂທຫາ (360) 486-3471. ກະຮຸນາໂທຫາທະນາຍຄວາມຖ້າທ່ານກວາທ່ານມີຄຳຖາມດ້ານກົດໝາຍ.

Laotian Translation

Đây là thông báo quan trọng về giấy phép hành nghề cờ bạc của quý vị. Nếu quý vị không hồi đáp, quý vị có thể bị mất giấy phép và không thể làm việc. Nếu quý vị có thắc mắc gì về những giấy tờ này, xin gọi số (360) 486-3471. Xin liên lạc với luật sư nếu quý vị có thắc mắc liên quan đến vấn đề pháp lý.

Vietnamese Translation

본 내용은 귀하의 갬블링 라이선스에 대한 중요한 고지 사항입니다. 회신을 하지 않을 경우 라이선스가 취소되고 영업(업무)을 할 수 없게 됩니다. 본 문건과 관련하여 문의 사항이 있으면 (360) 486-3471 번으로 연락해 주십시오. 법률 관련 질문이 있으신 경우 변호사에게 문의해 주십시오.

Korean Translation

以下是有关您的博彩业执照的重要通知。如果您不回复，您可能会失去执照，并无法工作。如果您对这些文件有疑问，请电洽(360) 486-3471。如果您有法律方面的问题，请打电话向律师咨询。

Chinese Translation

Это важное извещение, касающееся вашей лицензии на осуществление деятельности по организации и проведению азартных игр. Если вы не ответите на него, вы можете потерять свою лицензию и не сможете продолжить работу. Если у вас есть вопросы по поводу этих документов, позвоните по телефону (360) 486-3471. С вопросами юридического характера обратитесь к адвокату.

Russian Translation

Este es un aviso importante acerca de su licencia para juegos de azar. Si usted no responde, puede perder su licencia y no podrá trabajar. Si tiene preguntas acerca de estos documentos, llame al (360) 486-3471. Por favor llame a un abogado si tiene preguntas legales.

Spanish Translation

នេះគឺជាសេចក្តីជូនដំណឹងសំខាន់អំពីអាជ្ញាប័ណ្ណអាជីវកម្មល្បែងស៊ីសងរបស់អ្នក។ បើអ្នកមិនឆ្លើយតបវិញទេ អ្នកអាចនឹងបាត់បង់អាជ្ញាប័ណ្ណរបស់អ្នក ហើយនឹងមិនអាចធ្វើការបានទេ។ បើអ្នកមានសំណួរនានាអំពីក្រដាសទាំងនេះ សូមហៅទូរស័ព្ទទៅលេខ (360) 486-3471។ សូមហៅទូរស័ព្ទទៅមេធាវីម្នាក់ បើអ្នកមានសំណួរនានាផ្នែកច្បាប់។

Khmer Translation

STATE OF WASHINGTON  
GAMBLING COMMISSION

In the Matter of the Revocation of the License to  
Conduct Gambling Activities of:

NO. CR 2020-01587

KANHA S. PRUM  
License No. 68-07087

REQUEST FOR  
ADMINISTRATIVE HEARING  
AND INTERPRETER

Licensee.

**Please read this notice carefully.**

This is an important notice, which determines whether you will have the right to a hearing in this matter. If you have any questions regarding your legal rights, you should contact an attorney.

If you have general questions about the hearings process, contact Rules Coordinator, Ashlie Laydon, at (800) 345-2529, extension 3473.

**What do I need to do?**

1. To discuss settlement options and to keep your right to a hearing, you **MUST** complete and sign this form, then return it within 23 days from the date of mailing the Notice of Administrative Charges.

You may mail it to:

Washington State Gambling Commission  
Attention: Legal and Records Division  
P. O. Box 42400, Olympia, Washington 98504-2400

2. Place a check mark next to the statement(s) that describe your requests in this matter.

\_\_\_\_\_ I want the opportunity to discuss settlement options and keep the right to a hearing.

\_\_\_\_\_ I do **NOT** want a hearing. I understand this may result in a Default Order for the revocation of my gambling license.

3. **Current address and contact information.**

Address \_\_\_\_\_

Phone number \_\_\_\_\_

E-mail address \_\_\_\_\_

Please initial here \_\_\_\_\_ if you would like to receive further contact and documents by E-mail only.

IN RE: KANHA S. PRUM

CR 2020-01587

REQUEST FOR ADMINISTRATIVE HEARING AND INTERPRETER

4. \_\_\_\_\_ I will be represented by an attorney

Name \_\_\_\_\_

Address \_\_\_\_\_

Phone Number \_\_\_\_\_

**\*Please have your attorney send the Commission a Notice of Appearance within 10 days.**

5. You may attach a letter or a statement explaining your position in this matter.

\_\_\_\_\_ YES, letter or a statement attached.

\_\_\_\_\_ NO, letter or a statement is not attached.

**How do I request an interpreter?**

You have the right to have an interpreter for your administrative hearing, if you or any witness you call to testify, is a limited English-speaking person or a hearing-impaired person.  
This service is free of charge.

**Place a check mark next to the statement(s) that describe your requests in this matter.**

\_\_\_\_\_ NO, I will **NOT** require an interpreter.

\_\_\_\_\_ YES, I will require an interpreter for the \_\_\_\_\_ language.

\_\_\_\_\_ I will require an interpreter for a hearing impairment.

\_\_\_\_\_ I will be calling a limited English speaking witness who will require  
an interpreter in the \_\_\_\_\_ language.

\_\_\_\_\_ I will be calling a hearing impaired person as a witness who will require an interpreter.

**If you do not understand these documents, you are strongly encouraged to contact an attorney.**

To request a hearing, you **MUST** complete, sign, date, and mail this form to the Washington State Gambling Commission as set out on page 1. Failure to do so will result in a waiver of your rights to a hearing in this matter and **may lead to the revocation (taking) of your gambling license**, under RCW 34.05.400 and WAC 230-17-010.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

**\*\*SIGN HERE\*\***

IN RE: KANHA S. PRUM

CR 2020-01587